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## VIA CM/ECF ONLY

Honorable Jose R. Almonte, U.S.M.J. Martin Luther King Building & U.S. Courthouse 50 Walnut Street, Room 4015 Newark, NJ 07101

> RE: Louis v. State of New Jersey, *et al.* Civil Action No: 2:22-cv-04490

> > Joint Status Letter

Judge Almonte:

This office represents the plaintiff, James Louis, and writes to provide this joint-status letter on behalf of all parties to this litigation.

Depositions in this matter are ongoing. Currently, the parties are working through scheduling conflicts to arrange the second (or continued) deposition of Mr. James Louis. Likewise, the parties still need to schedule defendant depositions which will include, at least, the remaining named defendant officers and a corporate designee for the Elizabeth Police Department.

Additionally, plaintiff may need to subpoena, for deposition, select individuals who worked for the Union County Prosecutor's Office.

To that end, the parties request that the Court **extend the discovery end date to October 31, 2024**. The parties will keep the Court apprised of any difficulty in scheduling the remaining depositions.

Respectfully submitted,

**HINSON SNIPES, LLP** 

Eric Dakhari, Esquire